

REMARKS

Claim Rejections – 35 U.S.C. § 102

The Examiner has rejected claims 1-5, 7-11, 13-18, and 20 under 35 U.S.C §102, as being anticipated by U.S. Patent No. 6,243,774 B1 to Eide et al. (“Eide”). For the reasons set forth below, Applicant asserts that the cited reference fails to teach or render obvious Applicant’s invention as claimed in claims 1-5, 7-11, 13-18, and 20.

Eide discloses a method “of managing computer resources [to]... facilitate concurrent maintenance operations by automatically re-associating existing resources in a computer... with appropriate hardware devices installed into the computer after a concurrent maintenance operation has been performed.” (Eide abstract lines 1-6) “To map the resource to a hardware device, a location identifier, a device type identifier and a device identifier are provided. The location identifier provides an indication of where the associated hardware device is located in the computer...” (Eide column 9, lines 7-11) “The device type therefore determines what type of hardware driver to associate with a device. As such, the device type may also be considered to be a hardware driver class identifier...” (Eide column 9, lines 19-22) Eide discloses a resource data structure (Eide Figure 2, item 40) that includes information about the resource in question with a location identifier, a device type identifier, and a resource identifier. The device type identifier is the specific piece of information within Eide’s structure that “determines what type of hardware driver to associate with a device” (Eide column 9, lines 20-21). This piece of information is not specific to an individual driver per device, it only determines the driver

class. There is no piece of information within Eide's resource data structure that specifically points to a particular driver address location.

With respect to independent claim 1 in the presently claimed invention, Applicant teaches and claims "A method comprising identifying a device by a unique identifier, obtaining the unique identifier, and using the unique identifier in conjunction with a mapping table, wherein the mapping table contains at least a column containing unique identifiers of devices coupled to a column containing updateable addresses of drivers specific to each device, to obtain an address of a driver for the device." The mapping table associates unique device identifiers with corresponding addresses pointing to device drivers specific to each device. The mapping table efficiently couples every individual device identifier present in the system to the every corresponding driver address per device. It is not limited to coupling one device location to one device driver type as is Eide.

Furthermore, it is not obvious that the functionality of a centralized mapping table, which groups and couples all device identifiers to all driver addresses, is similar to a single device resource data structure. A mapping table is an efficient way of associating all devices on a system with their respective drivers by utilizing a contiguous piece of memory to store the unique identifiers and their associated driver addresses. All devices can look in one location for their driver addresses, whereas a resource data structure is specifically created to serve the purpose of one device and would therefore not be centralized or capable of accommodating more than one device. It is certainly not inherently obvious that when utilizing more than one of Eide's resource data structures

they would be located in contiguous memory and allow a driver address lookup specific to one address, the address of the mapping table. Thus, because Eide does not teach the presently claimed invention, Applicant respectfully submits that Eide does not anticipate claim 1.

Claims 2-5 are dependent upon independent claim 1. Thus, for at least the same reasons advanced above with respect to independent claim 1, Applicant respectfully submits that Eide does not anticipate claims 2-5.

In regard to independent claims 7 and 14, Eide does not anticipate Applicant's invention for the same reason as independent claim 1. Again, the functional purpose of Applicant's presently claimed invention's mapping table structure and Eide's resource data structure are entirely different. As such, Eide does not in any way disclose a mapping table, which is fundamental to Applicant's invention. Thus, because Eide does not teach the presently claimed invention, Applicant respectfully submits that Eide does not anticipate claims 7 and 14.

Furthermore, claims 8-11 and 13 are dependent upon independent claim 7. Thus, for at least the same reasons advanced above with respect to independent claim 7, Applicant respectfully submits that Eide does not anticipate claims 8-11 and 13.

Additionally, claims 15-18 and 20 are dependent upon independent claim 14. Thus, for at least the same reasons advanced above with respect to independent claim 14, Applicant respectfully submits that Eide does not anticipate claims 15-18 and 20.

As such, Eide does not teach or anticipate Applicant's invention as claimed in pending claims 1-5, 7-11, 13-18, and 20. Applicant respectfully requests withdrawal of the 35 U.S.C. 102 rejection of claims 1-5, 7-11, 13-18, and 20.

Claim Rejections – 35 U.S.C. § 103

The Examiner has rejected claims 6, 12, and 19 under 35 U.S.C §103(a) as being unpatentable over U.S. Patent No. 6,243,774 B1 to Eide et al. ("Eide") in view of Internet Engineering Task Force ("Task Force"), Simple Service Discovery Protocol/1.0, Operating without an Arbiter, October 29, 1999. For the same reasons set forth above in regard to Eide in view of the response to the 35 U.S.C §102 rejection, Applicant asserts that the cited references fail to teach, suggest, or render obvious Applicant's invention as claimed in claims 6, 12, and 19.

Claim 6 is dependent upon independent claim 1. Thus, for at least the same reasons advanced above with respect to independent claim 1, Applicant respectfully submits that Eide and Task Force, taken alone or in combination, do not render this dependent claim obvious.

Claim 12 is dependent upon independent claim 7. Thus, for at least the same reasons advanced above with respect to independent claim 7, Applicant respectfully submits that Eide and Task Force, taken alone or in combination, do not render this dependent claim obvious.

Claim 19 is dependent upon independent claim 14. Thus, for at least the same reasons advanced above with respect to independent claim 14, Applicant respectfully submits that Eide and Task Force, taken alone or in combination, do not render this dependent claim obvious.

Thus, Eide and Task Force do not teach, suggest, or render obvious Applicant's invention as claimed in pending claims 6, 12, and 19. Applicant respectfully requests withdrawal of the 35 U.S.C. 103(a) rejection of claims 6, 12, and 19.

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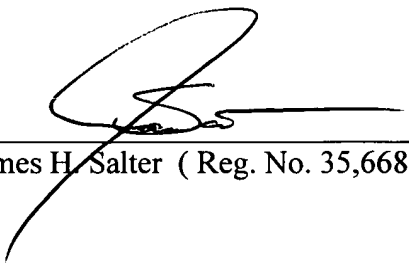
If a telephone conference would facilitate the prosecution of this application, the

Examiner is invited to contact James H. Salter at (408) 720-8300.

Respectfully submitted,

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